

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: JANET WILAMOWSKI : CHAPTER 13
Debtor :
 :
 :
 : Bankr. No. 23-12723-PMM
 :

DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania,

Janet Wilamowski, Debtor, through her Attorneys Allen B. Dubroff, Esq. and Associates, LLC, answers the Motion to Dismiss filed by the Chapter 13 Trustee as follows:

1. Admitted.
2. Admitted.
3. Admitted. Debtor required additional time to proceed with this matter as a result of the need to locate records necessary to complete her schedules and Statement of Affairs. Debtor was self-employed for many years and discontinued her business with many documents unavailable to her until early 2024, including but not limited to, tax returns and agreements related to personal guarantys for obligations that were primarily debts of the now defunct business (Vision Development).

Furthermore, there was confusion with regard to three separate loan facilities due and owing to PNC Bank.

Debtor has now provided substantially all of the requested documents to the Chapter 13 Trustee necessary to an evaluation of her financial condition and plan.

Debtor has made the required plan payments of \$1500.00 per month and will be current with regard to the payments due on or before March 26, 2024.

Debtor's ability to fund her plan and remit the payments necessary for her support and maintenance include her monthly Social Security check.

WHEREFORE, the Debtor requests that the Motion to Dismiss be Denied and the Debtor proceed with her Chapter 13 case and attendance at a Section 341 Meeting.

Respectfully Submitted,

By: 
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